

# 643



# CARDINAL DISTRIBUTING, LLC

August 7, 2003

Attn: TTB Notice No. 4  
Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
P.O. Box 50221  
Washington, D.C. 20091-0221

I understand that the Bureau is considering regulations with respect to the alcohol content and type to be used in FAB products. My company, Cardinal Distributing, is a beer and wine wholesaler serving four counties in southwestern Montana. We represent Anheuser-Busch, Miller Brewing and a number of other domestic and import beers and wines.

I am very concerned that the distinction between the traditional types of alcoholic beverages will be blurred and become confusing if what is referred to as the 50-50 standard is allowed to become the rule of the land. I strongly support the 90-10 standard which would limit the amount spirit based alcohol used in FAB products to 0.5 percent by volume.

FAB products give the consumer a new choice, but should not confuse the consumer. Alcohol is a product that should be used carefully and anything that distorts or confuses consumers, particularly young consumers, should not be allowed. The definitions and distinctions in the Internal Revenue Code have been in effect for over 100 years and have had the effect of clearly separating and defining the various alcoholic products and those distinctions should remain clear.

Our company supports the 0.5% standard and encourages the TTB to give final approval to this standard.

Sincerely,

Edward M. Brandt  
President